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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
CONSTANCE FENTON,
Defendant.

Case No. 2:12-cr-400-JAD-GWF-3

**STIPULATION TO EXTEND
SURRENDER DATE TO ALLOW
FOR MEDICAL TREATMENT
(SECOND EXTENSION)**

COMES NOW the Defendant, CONSTANCE FENTON, by and through her counsel of record, MICHAEL R. PANDULLO, ESQ., and pursuant to stipulation by the parties as set forth below, hereby requests that this Honorable Court extend the Defendant's surrender date to allow for medical treatment. In support hereof, the Defendant gives the Court to understand as follows:

1. On October 24, 2012 the United States filed a 20-count Indictment charging Ms. Fenton and her co-defendants with various crimes relating to an investment scheme.

2. On September 17, 2014, Ms. Fenton entered a plea of guilty to Count 9 of the Indictment, Conspiracy to Commit Money Laundering (18 USC §1956(h)).

3. This matter came before the Court for sentencing on March 2, 2015. With respect to incarceration, the Court ordered Ms. Fenton to serve 6 months incarceration in the U.S. Bureau of Prisons (BOP), followed by 3 years of supervised release, the first 6 months to be spent on home detention.

1 4. The Court provided Ms. Fenton with a self-surrender date of June 2, 2015.

2 5. During her annual mammogram on March 11, 2015, doctors discovered a tumor in
3 Ms. Fenton's right breast.

4 6. On May 29, 2015, the parties filed a Stipulation to extend the surrender date to allow
5 time for medical treatment, and the Court granted the request. By Order filed May 29, 2015, the
6 Court extended the surrender date 30 days to July 2, 2015.

7 7. The lumpectomy procedure to remove the tumor from her breast has not yet been
8 performed due to the scheduling requirements of her surgeon. However, she has received a
9 more definite timeline with respect to the surgery and treatment, as follows:

10 July 9, 2015 – Pre-operative screening

11 July 15, 2015 – Sentinel node injection

12 July 16, 2015 – Lumpectomy

13 July 23, 2015 – Post-operative consultation

14 Her surgeon also advises that once the pathology results from the surgery are available, Ms.
15 Fenton may require radiation and/or chemotherapy. This treatment may take two to three
16 months.

17 8. Records documenting the foregoing treatment schedule have been provided to the
18 Assistant United States Attorney.

19 9. The probation officer supervising Ms. Fenton's release in the State of Washington,
20 Mark Okano, is aware of the status of her health. Mr. Okano is supportive of a second extension
21 for the purposes of medical treatment, as confirmed by telephone today. He reports Ms. Fenton
22 is fully compliant with respect to the conditions of her release.

23 10. For the foregoing reasons, Ms. Fenton is requesting a 90-day extension of her July 2,
24 2015 surrender date.

25 11. The Assistant United States Attorney stipulates to the extension.

1 WHEREFORE, the Defendant requests that this Honorable Court extend her surrender
2 date of July 2, 2015 for a period of 90 days.

3 RESPECTFULLY SUBMITTED this 26th day of June, 2015.

4
5 MICHAEL R. PANDULLO, Esq.
6

7 /s/ Michael R Pandullo
MICHAEL R. PANDULLO, Esq.
8 *Attorney for Defendant Constance Fenton*

9 STIPULATED AND AGREED TO:

10
11 STEVEN W. MYHRE, ESQ.
12 Assistant United States Attorney

13 ORDER

14 IT IS ORDERED the defendant's self-surrender date is continued to October 2, 2015.

15
16 DATED this 1st day of July, 2015.

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19 JENNIFER A. DORSEY
20 UNITED STATES DISTRICT JUDGE
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